

## REMARKS

1. Claims 1-24 were pending in the application. Claims 10, 12, 14 and 16 have been canceled and new Claims 25-28 have been added. The Examiner is thanked for withdrawing previous rejections under 35 U.S.C. §§ 101 and 103(a). The present office action rejects Claims 1-24 under 35 U.S.C. § 102(e) as anticipated by U.S. Pat. No. 6,324,541 to Paris de l'Etraz et al. ("de l'Etraz").

2. Applicants thank the Examiner and her supervisor, William Bashore, for the courtesy of an interview granted on July 13, 2005. Also participating were John F. Rollins, an in-house patent attorney of the assignee, the undersigned and Marc V. Richards, from the law firm of Brinks Hofer Gilson and Lione. Claim 1 was discussed, with the undersigned arguing that certain limitations pertaining to an industry were not taught or suggested in the cited references, and that the term "consisting of" further limited the scope of Claim 1. Agreement was not reached on the claims.

3. Applicants have amended independent Claims 1, 7, and 13 of the present application in order to better claim the subject matter of the present invention. de l'Etraz does not anticipate, nor does de l'Etraz teach or suggest, the claims or the amended claims. For instance, de l'Etraz has no teaching concerning a list of industries. The passages cited in the rejection, col. 3, lines 41-63, concern a user's sphere of influence, and specifically mention relational patterns between the user and entities (through the persons associated with those entities) in public or private databases, or both. The passage discusses providing a contact pathway, receiving an organization or person's name input, searching for associations between the user and the organization and/or person, and displaying a contact pathway. The passage also mentions finding and displaying an optimal path based on the degree of familiarity each person has (e.g., friends, golfing buddies, casual acquaintances, etc.) with the next person along the contact pathway.

The second de l'Etraz passage cited, col. 5, lines 43-60, discusses a stand-alone application program that allows a user to enter and store private contact information, and a data-mining tool that allows the user to intelligently establish his or her contacts and display, via a graphical user interface, the optimal relationship path to reach other desired contacts. This allows the user to learn the full sphere of their influence. Neither passage teaches or suggests presenting a list of industries associated with the client, because neither passage refers to industries. Thus, de l'Etraz does not anticipate, teach, or suggest the limitations of the present claims.

de l'Etraz does not teach or suggest an industry or a list of industries

The rejection also cites de l'Etraz, col. 3, lines 47-55 and col. 15, lines 53-64, as teaching the limitation of presenting a list of industries and allowing selection of a list of industries from the list of industries. Advisory Action, mailed June 17, 2005. In addition, further passages are also cited, including col. 2, lines 13-16 and col. 20, lines 18-24. Interview Summary mailed July 18, 2005. The rejections admit that de l'Etraz does not teach or suggest industries *per se*, but a company, and the argument is that since a company is normally associated with an industry, presenting a company is the equivalent of presenting an industry. In other words, as understood by the Applicants, the Examiner's position appears to be that presenting a company inherently presents the industries with which the company is associated.

Applicants traverse this assertion. Displaying a company is not necessarily equivalent to displaying a list consisting of associated industries. Without an express listing of the industries, no selection of an industry can be made. Moreover, with an express identification of the industry, a keyword text search of a knowledge repository containing information relevant to the selected industry cannot be made. Accordingly, in the context of the claimed invention, Applicants have shown that a company is not "equivalent" to an industry. Applicants submit that the rejection is overcome.

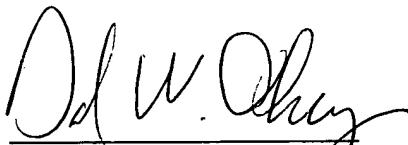
Nevertheless, in order to expedite prosecution, Applicants have amended independent Claims 1, 7, and 13 to include additional limitations that remove the claims even further from the reference cited. Support for the additional limitations is found at

least in the specification, p. 36, line 28, to p. 37, line 2, p. 37, lines 9-15 and 29-31, and p. 38, lines 1-2, and in Fig. 18.

Additional limitations have also been added to Claims 3 and 4 that further distinguish the claims from de l'Etraz, who does not teach or suggest allowing selection by checking check-boxes or allowing correcting information by re-selecting information. Support for the amendment to Claim 3 is found at least in Fig. 25 and in the specification at p. 37, lines 29-31. Support for the amendment to Claim 4 is found at least in Fig. 26 and in the specification at p. 38, lines 1-2. Support for new Claim 25 is found at least in the specification at p. 37, lines 7-9. Support for new Claim 26 is found at least in Fig. 25 and in the specification at p. 37, lines 29-31. Support for new Claim 27 is found at least in the specification at p. 38, lines 14-17. Support for new Claim 28 is found at least in Fig. 27 and in the specification at p. 38, lines 5-6. These additional limitations concerning the preparation of the dossier are also not taught or suggested in the reference.

4. Applicants have amended claims and have shown that the reference does not anticipate, teach, or suggest the amended claims of the application. Applicants respectfully request the Examiner to enter the amendment, to withdraw the rejections and to grant allowance of this application.

Respectfully submitted,



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